

**To:** Pellegrino, Carl[Pellegrino.Carl@epa.gov]  
**From:** Daly, Eric  
**Sent:** Tue 11/29/2016 8:52:50 PM  
**Subject:** RE: NFB Site: Profile Finalization

So they had to remove more from that hot spot? What was up with your vehicle?

**From:** Pellegrino, Carl  
**Sent:** Tuesday, November 29, 2016 3:16 PM  
**To:** Daly, Eric <Daly.Eric@epa.gov>  
**Subject:** Re: NFB Site: Profile Finalization

GES finished excavating the hot/warm spots we discussed yesterday.

Once it's scanned and cleared, they can start on the below grade later.

Sent from my iPhone

On Nov 29, 2016, at 1:26 PM, Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)> wrote:

What happened to key?

Regards,

Eric

"We must, indeed, all hang together, or assuredly we shall all hang separately", Benjamin Franklin  
Eric M. Daly  
On-Scene Coordinator/Radiological Response Specialist  
US Environmental Protection Agency- Region II

ERRD/RPB/PPS  
[2890 Woodbridge Avenue](https://www.epa.gov/errd)  
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[daly.eric@epa.gov](mailto:daly.eric@epa.gov)

908-420-1707

On Nov 29, 2016, at 1:14 PM, Pellegrino, Carl <[Pellegrino.Carl@epa.gov](mailto:Pellegrino.Carl@epa.gov)> wrote:

If I said "don't ask"! That would be a dead giveaway!

I haven't been there yet. Sitting in a Chevy dealership, working on getting the GOV key replaced. Pete & Frank know.

Sent from my iPhone

On Nov 29, 2016, at 12:52 PM, Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)> wrote:

See below. How is everything going there?

**From:** Daly, Eric

**Sent:** Tuesday, November 29, 2016 12:52 PM

**To:** 'Cory McMann' <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>; Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com

**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>

**Subject:** NFB Site: Profile Finalization

**Importance:** High

Hi:

I apologize for the delayed response. I am in our REOC this week and addressing response issues. I understand. I actually have a write up that I always use. I wanted to make sure we were all on same page. I made a pdf of my cheat sheet and attached.

As I look closer to the data, I see a note on the chromium

results "Compound was found in the blank and sample". **So I assume there was a cross contamination issue in the lab? Does that put in question all values for the chromium results?**

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg, ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg, ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg, ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg, ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg?

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg . **For this sample the Rule of 20 would be 5.5 mg/l of lead with the limit being 5.0 mg/l.**

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg. **For this sample the Rule of 20 would be 215 mg/l of Barium with the limit being 100 mg/l.**

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg (**14 mg/l: 5.0 mg/l**), Lead at 1300 mg/kg (**65 mg/l: 5 mg/l**). This may be the one regarding the Trench you speak of below.

We will have a TCLP sampling strategy for the waste. At this time, we will only be sampling/analyzing the material we have excavated and plan to dispose. We need to put a rush on this analytical in order to get the disposal process moving. At a later date we will obtain TCLP information for other areas.

**So as I understand it, our radiological procedures are approved but we just need to verify the RCRA characteristics.**

Please let me know if there are any questions at this time.

Regards,

Eric M. Daly  
On-Scene Coordinator/Radiological Response Specialist  
US Environmental Protection Agency- Region II

ERRD/RPB/PPS  
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Edison, NJ 08837  
[daly.eric@epa.gov](mailto:daly.eric@epa.gov)  
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately", Benjamin Franklin

**From:** Cory McMann [<mailto:Cory.McMann@usecology.com>]  
**Sent:** Tuesday, November 29, 2016 9:05 AM  
**To:** Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; [Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); [Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com)  
**Cc:** Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>  
**Subject:** RE: NFB Site: Profile Finalization

Just to clarify, the total results divide by 20 are the hurdle based on the analysis provided. If TCLP analysis on representative sample(s) can be completed showing the levels below are not exceeded the waste can be accepted at WDI. However, if the analysis shows the waste exhibits a characteristic the waste can still be accepted for stabilization at MDI (with some profile modifications) and final disposal to occur at WDI.

Cory

**From:** Joel Belloni

**Sent:** Tuesday, November 29, 2016 8:52 AM

**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com

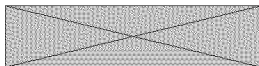
**Cc:** Cory McMann <[Cory.McMann@usecology.com](mailto:Cory.McMann@usecology.com)>; Tim Curtin <[tcurtin16@aol.com](mailto:tcurtin16@aol.com)>

**Subject:** RE: NFB Site: Profile Finalization

Chromium should be below 5 mg/L, Lead below 5 mg/L and Barium below 100 mg/L.

**Joel D. Belloni**

*Technical Service Specialist*



734.521.8015

734.589.9608 cell

[joel.belloni@usecology.com](mailto:joel.belloni@usecology.com)

In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

**From:** Daly, Eric [<mailto:Daly.Eric@epa.gov>]  
**Sent:** Tuesday, November 29, 2016 8:46 AM  
**To:** Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com  
**Subject:** NFB Site: Profile Finalization

Good Morning Everyone:

I hope everyone had a nice holiday. I am hoping to get back on track with our profile finalization. As far as the metals exceedance, we are working on a proposal for TCLP analysis. Joel, what regulatory levels are you referring to so we are all on the same page.

Thanks

**From:** Joel Belloni [<mailto:Joel.Belloni@usecology.com>]  
**Sent:** Thursday, November 17, 2016 4:14 PM  
**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com  
**Subject:** RE: Profile Finalization- Niagara Falls

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300

mg/kg

ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg , Lead at 1300 mg/kg. This may be the one regarding the Trench you speak of below.

ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg

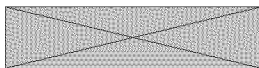
ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg

ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg

Thank you,

**Joel D. Belloni**

*Technical Service Specialist*



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[joel.belloni@usecology.com](mailto:joel.belloni@usecology.com)

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**From:** Daly, Eric [<mailto:Daly.Eric@epa.gov>]

**Sent:** Thursday, November 17, 2016 3:34 PM

**To:** Joel Belloni <[Joel.Belloni@usecology.com](mailto:Joel.Belloni@usecology.com)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>; [Peter.Lisichenko@WestonSolutions.com](mailto:Peter.Lisichenko@WestonSolutions.com); [Robert.Croskey@WestonSolutions.com](mailto:Robert.Croskey@WestonSolutions.com)  
**Subject:** RE: Profile Finalization- Niagara Falls

Hi Joel:

Could you please identify which samples you are referring to? If one result for high lead is the GNBC Warehouse 4 Trench Sample, we are aware and spoke about handling this one area separately. That was an oil drain and we took a sample there just for that purpose. That does not represent the entire Site. Please note, that area is not one of the areas planned to initially ship in 2016.

Thanks

**From:** Joel Belloni [<mailto:Joel.Belloni@usecology.com>]  
**Sent:** Thursday, November 17, 2016 2:07 PM  
**To:** Daly, Eric <[Daly.Eric@epa.gov](mailto:Daly.Eric@epa.gov)>; Nguyen, Lyndsey <[Nguyen.Lyndsey@epa.gov](mailto:Nguyen.Lyndsey@epa.gov)>  
**Subject:** Profile Finalization- Niagara Falls

Good Afternoon-

We have completed the review of the radiological portion of the analysis and we have an outstanding issue in regards to the RCRA component. In the analysis attached, there are several hits for Cadmium and Lead that are above regulatory levels. Since this analysis was ran in totals, some of the hits are not below the divide by twenty rule. Is there any TCLP analysis available? Would it be possible to pull a representative sample prior to shipping to show the codes don't apply?



Let me know your thoughts and we can wrap this up shortly.

Regards,

**Joel D. Belloni**

Technical Service Specialist

[joel.belloni@usecology.com](mailto:joel.belloni@usecology.com)

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<image001.jpg> 7440 College Parkway Suite 300 Livonia, MI 48152  
In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

*Emergency Response: 800.839.3975*

*Customer Service: 800.592.5489*

<image002.jpg>

<Rule of 20 Toxicity Hazardous Waste Characteristic Without TCLP.pdf>